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GARVEY SQUARE COOPERATIVE BOARD OF DIRECTORS

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

HO RIM KAM,

Petitioner,

vs.

MARTIN LUTHER KING, JR.-MARCUS
GARVEY SQUARE COOPERATIVE
BOARD OF DIRECTORS,

Respondent.

Case No.: C07-4414 SBA

**DECLARATION OF ELIZABETH
WILLIAMS IN SUPPORT OF REQUEST
FOR CONSIDERATION OF LATE FILED
REPLY TO PETITIONER'S
OPPOSITION TO RESPONDENT'S
MOTION TO DISMISS (FILED ON
10-3-07 AT 12:49 A.M.)**

Date : October 16, 2007

Time : 1:00 p.m.

Courtroom: 3, 3rd Floor

Judge : Hon. Sandra B. Armstrong

I, ELIZABETH WILLIAMS, declare under penalty of perjury as follows:

1. I am an attorney duly licensed to practice law before all Courts of the State of California and I am admitted to practice before this Court. I am of counsel for Kaufman, Dolowich & Voluck, LLP, attorneys of record for Respondent Martin Luther King, Jr.-Marcus Garvey Square Cooperative Board of Directors. I have personal knowledge of the facts contained in this Declaration, and if called as a witness, I would testify competently to the facts stated herein.

2. I submit this Declaration pursuant to the United States District Court, Northern District of California's General Order 45, Section 6E regarding Electronic Filing.

3. On October 2, 2007, I experienced numerous technical difficulties while attempting to electronically file Respondent's Reply to Petitioner's Opposition to Respondent's Motion to Dismiss.

4. This document was complete at 11:20 p.m., as evidenced by the document properties.

5. I was unable to successfully log into the electronic-filing service until approximately 11:50 p.m. Prior to that time, the system informed me that my login information was invalid, despite repeated login attempts.

6. At approximately 11:50 p.m., I was able to successfully log-in to the electronic filing service.

7. At that point, I experienced repeated technical difficulties uploading the document into the electronic filing system.

8. As a result, I was unable to electronically file this document until approximately one hour later, at 12:40 p.m.

I apologize to this Court and opposing counsel for any inconvenience I have caused, including having to take the time to review this declaration and request for consideration of late filed papers.

Based on the foregoing, I respectfully request that this Court consider Respondent's Reply to Petitioner's Opposition to Respondent's Motion to Dismiss in ruling on the pending Motion to Dismiss.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on October 3, 2007 at San Rafael, California.

/S/
Elizabeth Williams, Esq.